

July 15, 2015

Kristine Koch
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-115
Seattle, WA 98101

**Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for June 2015**

Dear Ms. Koch:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

1. ACTIONS TAKEN IN JUNE 2015

- None.

Deliverables Approved by EPA

- None.

Deliverables Submitted to EPA and Other Actions

- On June 2, 2015, a project managers call was held with the LWG, EPA, and its partners.
- On June 2, 2015, a Remedial Investigation (RI) technical call was held with the LWG and EPA to discuss the Executive Summary.
- On June 12, 2015, the LWG submitted an electronic version of the Draft Final Remedial Investigation Report and associated cover letter for EPA review.
- On June 17, 2015, a Senior Managers meeting was held with EPA and the LWG.
- On June 19, 2015, the LWG submitted a revised Bioaccumulation Modeling Report.
- On June 29, 2015, a meeting was held with the LWG, EPA, and its partners to discuss the Oregon Department of Environmental Quality's source control report and its interconnectedness with the in-water Feasibility Study (FS).

Comments/Documents Provided by EPA

- On June 2, 2015, EPA provided EPA's draft final modifications to the FS Section 2 and an updated version of the FS Section 1.
- On June 2, 2015, EPA provided EPA's decisions on the LWG's proposed modifications to the RI Executive Summary.

- On June 3, 2015, EPA provided two updates to the draft final FS Section 2 materials provided by EPA on June 2. EPA changed the title of Figure 2.2-2 and provided an updated Ecological Preliminary Remediation Goal (PRG) table without total petroleum hydrocarbon (TPH) aromatics.
- On June 3, 2015, EPA provided a further revised Figure 2.2-2.
- On June 5, 2015, EPA provided updated FS Section 2 PRG tables.
- On June 11, 2015, EPA provided the LWG a letter announcing changes to the EPA Portland Harbor Superfund Site team.
- On June 26, 2015, EPA requested input values used for Equation 2 from Maynard (1998) in the Draft FS Appendix Hc.
- On June 30, 2015, EPA notified the LWG that the EPA draft FS Section 3 will be provided by July 29 and Section 4 no later than August 7. EPA will provide a full presentation on technical aspects of Sections 3 and 4 during the July 31 rollout meeting.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

- None.

3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

- None.

4. SCHEDULE FOR THE NEXT FOUR MONTHS

The LWG project team will continue to coordinate with the EPA Remedial Project Managers to finalize the RI report and to assist EPA as requested in the development of EPA's Draft Final FS per the process and schedule presented in Jim Woolford's April 7, 2015 memorandum and a negotiated revised schedule based on the information provided by Cami Grandinetti on June 30, 2015.

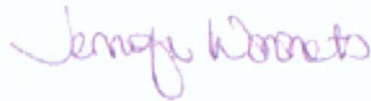
Submittal dates for pending documents currently under preparation by the LWG and scheduled for submittal in upcoming months are listed in Table 1: Status of Active LWG Deliverables—Portland Harbor RI/FS. This table includes pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2: Status of LWG Deliverables—Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on a number of documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests that EPA provide document approvals for these submittals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. Also, the LWG believes that many of the documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are, indeed, not needed.

If you have any questions, please give me a call at (503) 972-5014.

Sincerely,



Jennifer Woronets
LWG Administrative Project Coordinator

Copies:

- ODEQ (email only)
- NOAA (email only)
- Confederated Tribes of Warm Springs (email only)
- Confederated Tribes of Yakama Nation (email only)
- Confederated Tribes of Siletz (email only)
- Confederated Tribes of Umatilla (email only)
- Grand Ronde (email only)
- Nez Perce Tribe (email only)
- Ridolfi (email only)
- LWG Management
- LWG Repository

Table 1. Status of Active LWG Deliverables – Portland Harbor RI/FS.

| Deliverable¹ | Submittal Deadline² | Status/Comments | EPA Comments Target Date |
|--|---------------------------------------|--|---------------------------------|
| Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review | 03/20/2012 | Submitted 03/20/2012 EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15 <u>EPA revised draft FS Section 1 and 2 received 6/2/15</u> | 6/29/2012 |
| Draft Final Remedial Investigation Report | 8/29/2011 | Submitted 08/29/2011; EPA comments received on Section 1 and 2, Appendices A and H 11/30/2012 EPA comments received on Section 3 02/21/2013 EPA comments received on Section 4 03/19/2013 EPA comments received on Section 8 04/19/2013 EPA comments received on Section 9 8/16/2013 Revised Redline of EPA comments received on Section 9 9/26/2013 EPA comments received on Section 7 11/05/2013 Additional EPA comments received on Section 7 12/19/2013 EPA comments received on Section 6 05/07/2014 EPA comments received on Section 5 6/11/14 EPA comments received on Section 10 and 11 7/10/2014 EPA comments received on the Executive Summary 01/13/2015 EPA comments and direction to produce draft final RI received 4/27/15 <u>LWG submitted electronic version of Draft Final RI 06/12/15</u> | 10/29/2011 |

Notes:

- ¹ - **Bolded Deliverables** are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a).
Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.
Italicized Deliverables do not have stipulated penalty amounts.

- ² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.

Table 2. Status of LWG Deliverables – Portland Harbor RI/FS.

| Deliverable¹ | Submittal Deadline² | Status/Comments | EPA Comments Target Date |
|---|---------------------------------------|--|---------------------------------|
| Round 1 | | | |
| <i>Compilation of Information for Sources Between RM 11 and 11.6 East Bank of Portland Harbor</i> | November 2007 | Submitted to EPA and DEQ 11/21/2007. Need written response from DEQ and EPA that upland sources are under investigation consistent with the Road to the ROD. | |
| Round 2 Biota | | | |
| <i>Revised Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i> | 11/23/2005 | Submitted 11/23/2005; approved with conditions on 12/6/2005; a final QAPP addendum is required | 12/8/2005 |
| <i>Final Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i> | TBD | On 2/9/2006, the LWG submitted a response to EPA's comments on the 11/23/2005 version of the QAPP addendum. The LWG has not heard back from EPA on that response. The LWG believes that a final QAPP is not required. Need EPA agreement that this final QAPP is not required. | |
| Hydro/Sed Modeling | | | |
| <i>Phase 2 Hydrodynamic Re-calibration Report</i> | May 2009 | Submitted 5/7/2009; EPA comments received 7/22/2009 | |
| Groundwater Pathway | | | |
| <i>Draft Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan</i> | 4/22/2005 | Submitted 4/22/2005; EPA comments received 6/3/2005 | |
| <i>Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan - Response to EPA Comments</i> | TBD | Outstanding issues to be addressed in GW Appendix to Draft RI Report. | |
| <i>Revised Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan (including Appendix A - Site Summaries and Appendix B - Pilot Study Data Report)</i> | TBD | Outstanding issues to be addressed in GW Appendix to Draft RI Report. | |
| <i>Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i> | 4/29/2005 | Submitted 4/29/2005; EPA comments received 6/10/2005 | |

| Deliverable¹ | Submittal Deadline² | Status/Comments | EPA Comments Target Date |
|---|---------------------------------------|---|---------------------------------|
| <i>Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i> | No longer needed | The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed. | |
| <i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP</i> | 3/27/2006 | Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed. | 4/28/2006 |
| <i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3</i> | 10/7/2005 | Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005. | |
| <i>Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema</i> | 3/27/2006 | Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed. | |
| <i>Revised Transition-Zone Water FSP Addendum 2</i> | 3/27/2006 | Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed. | |
| Natural Attenuation | | | |
| <i>Step 2 Natural Attenuation Evaluation Report</i> | No longer needed | | |
| Tech Memos | | | |
| Revised TRV Selection TM | 10/23/2004 | Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE. | |

| Deliverable¹ | Submittal Deadline² | Status/Comments | EPA Comments Target Date |
|---|---------------------------------------|--|---------------------------------|
| Second Revision Preliminary Risk Evaluation Approach TM | 1/7/2005 | Submitted; EPA comments received 3/4/2005. On 6/10/2005, EPA directed the LWG to submit the final PRE approach TM with the PRE. The final PRE Approach was submitted as an appendix to the 9/9/2005 PRE. | |
| Comprehensive ERA Approach TM | 6/27/2004 | Submitted; EPA comments received 10/1/2004 | |
| Revised Comprehensive ERA Approach TM | TBD | In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed. | |
| Process for Derivation of PRGs TM | 1/20/2005 | Submitted; EPA comments received 6/30/2006; a revised tech memo is not required. | 3/21/2005 |
| Draft Approach to Determining Background for the Portland Harbor Superfund Site | 3/3/2006 | Submitted 3/3/2006; EPA comments received 6/5/2006; revised tech memo required. | 5/2/2006 |
| Revised Approach to Determining Background for the Portland Harbor Superfund Site | 7/20/2006 | The revised approach to determining background for the Portland Harbor Superfund Site will be provided in the Draft RI Report | |
| Process for Delineating the Extent of Contamination Upstream and Downstream of the ISA | | The approach for Delineating the Extent of Contamination Upstream and Downstream of the ISA will be provided in the Draft RI Report | |
| COPC Selection Interim Deliverable | ~1/23/2006 | In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed. | |
| ECOLOGICAL RISK ASSESSMENT | | | |
| Ecological Preliminary Risk Evaluation (PRE) | 9/9/2005 | Submitted 9/9/2005; EPA comments received 4/28/2006, a revised PRE is not required | 11/8/2005 |
| Round 2 Benthic Assessment Interpretation Report | 3/17/2006 | Submitted 3/17/2006; EPA comments received 7/6/2006 | 5/16/2006 |

| Deliverable¹ | Submittal Deadline² | Status/Comments | EPA Comments Target Date |
|--|---------------------------------------|--|---------------------------------|
| <i>Food Web Modeling Report: Evaluating Trophic Trace and the Arnot and Gobas Models for Application to the Portland Harbor Superfund Site</i> | 11/4/2005 | Submitted 11/4/2005; EPA comments received 3/10/2006 | 1/3/2006 |
| <i>Revised Ecological Water Screening Levels</i> | 5/26/2006 | Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006. | 7/9/2006 |
| Feasibility Study | | | |
| <i>Literature Survey of Treatability Studies</i> | October 2007 | Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS. | Jan-08 |
| <i>Round 3B (FS) Side-scan Sonar Data Report</i> | September 2008 | Submitted 5/18/2009 | |
| <i>Treatment Technologies Screening Table</i> | Early May 2009 | Submitted 6/5/2009; EPA comments received 7/9/2009 | 7/6/2009 |
| <i>Screening of Disposal Facilities for the Feasibility Study Memorandum</i> | Mid May 2009 | Submitted 6/18/2009; EPA comments received 7/10/2009 | 7/2/2009 |
| <i>Early Preliminary Remediation Goals (PRGs)</i> | Late March 2009 | Submitted 3/27/2009 | |
| <i>Benthic Toxicity AOPCs Check In Materials</i> | September 2010 | Submitted 9/07/2010 | |
| <i>Treatment Technology Evaluation Tools Memo</i> | - | Submitted 03/15/2011; EPA comments received 4/27/2011 | |
| <i>Draft Mitigation Determination Approach for Use in the FS Tools Memo</i> | - | Submitted 03/15/2011; EPA comments received 4/27/2011 | |
| <i>Draft Feasibility Study Costing Approach Tools Memo</i> | - | Submitted 03/15/2011; EPA comments received 4/27/2011 | |

| Deliverable ¹ | Submittal Deadline ² | Status/Comments | EPA Comments Target Date |
|--|--|---|--------------------------|
| <i>Draft Identification of "COCs" and Contaminant Mobility Evaluation Criteria For the Draft FS Tools Memo</i> | - | Submitted 03/16/2011; EPA comments received 4/27/2011 | |
| <i>Dredging Water Quality Evaluation Tools Memo</i> | - | Submitted 03/31/2011; EPA comments received 4/27/2011 | |
| Alternatives Screening Materials | | Submitted 04/06/2011 | |
| Draft FS Key Elements Presentation | - | Submitted Materials 06/06/2011 Presentation 06/21 and 06/22/2011 | |
| <i>EPA Directed Draft Feasibility Study (FS) Key Work Product</i> | 01/15/2012 | Submitted 01/16/2012 | NA |
| Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review | 03/20/2012 | Submitted 03/20/2012 EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15 <u>EPA revised draft FS Section 1 and 2 received 6/2/15</u> | 6/29/2012 |
| Draft Feasibility Study (FS) - Formal Publically Accessible Submittal | 03/30/2012 | Submitted 03/30/2012 EPA initial comments received 12/18/2012. EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15 <u>EPA revised draft FS Section 1 and 2 received 6/2/15</u> | 6/29/2012 |
| General Field/Data/RI Reporting | | | |
| <i>Validated Analytical Results</i> | 90 days following completion of each sampling activity | | |
| Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report | 2/21/2007 | Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report. | |

| Deliverable¹ | Submittal Deadline² | Status/Comments | EPA Comments Target Date |
|---|---------------------------------------|--|---------------------------------|
| <i>Draft Sediment Mobility Testing Data Report</i> | August 2009 | Submitted 8/11/2009 | EPA comments not anticipated |
| Draft Baseline Ecological Risk Assessment Report | Early September 2009 | Submitted 9/2/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010. EPA benthic approach comments received 09/27/2010. | 11/2/2009 |
| Draft Baseline Human Health Risk Assessment Report | Late September 2009 | Submitted 9/23/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010. | 11/23/2009 |
| Draft Remedial Investigation Report | Late October 2009 | Submitted 10/27/2009 EPA comments received 07/16/2010 | 12/27/2009 |
| <i>Benthic Toxicity Reanalysis Technical Memorandum</i> | Mid November 2009 | Submitted 11/13/2009 EPA benthic approach comments received 09/27/2010. | 01/13/2009 |
| <i>Supporting Electronic Information for Draft Benthic BERA</i> | November 2009 | Submitted 11/19/2009 | 01/19/2010 |
| Draft Final BHHRA | 5/2/2011 | Submitted 05/02/2011; EPA comments received 06/22/2012. EPA dispute decision received 12/07/12. | 7/2/2011 |
| Draft Final BERA | 7/5/2011 | Submitted 07/01/2011; EPA comments received 07/10/2012. EPA comments received on 12/21/2012. EPA comments received on 01/11/2013 | 9/1/2011 |
| Human Health and Ecological Risk Management Recommendations | July 2011 | Submitted 07/22/2011 | 9/22/2011 |

| Deliverable ¹ | Submittal Deadline ² | Status/Comments | EPA Comments Target Date |
|---|---------------------------------|--|--------------------------|
| Draft Final Remedial Investigation Report | 8/29/2011 | Submitted 08/29/2011; EPA comments received on Section 1 and 2, Appendices A and H 11/30/2012 EPA comments received on Section 3 02/21/2013 EPA comments received on Section 4 03/19/2013 EPA comments received on Section 8 04/19/2013 EPA comments received on Section 9 8/16/2013 Revised Redline of EPA comments received on Section 9 9/26/2013 EPA comments received on Section 7 11/05/2013 Additional EPA comments received on Section 7 12/19/2013 EPA comments received on Section 6 05/07/2014 EPA comments received on Section 5 6/11/14 EPA comments received on Section 10 and 11 7/10/2014 EPA comments received on the Executive Summary 01/13/2015 EPA comments and direction to produce draft final RI received 4/27/15 <u>LWG submitted electronic version of Draft Final RI 06/12/15</u> | 10/29/2011 |
| Final BHHRA | 3/28/2013 | Submitted: 02/11/2013 EPA comments received 02/15/2013 EPA conditional approval received on 02/26/2013. Final BHHRA posted and hardcopy submitted 03/25/13. EPA provided final approval of the BHHRA on 04/03/13 Final BHHRA errata posted 04/12/13. | 4/8/2013 |
| Final BERA | 4/1/2013 | Submitted: 04/01/2013; EPA comments received 06/07/13; Revised draft submitted to EPA 06/14/13 EPA comments received 06/26/13 EPA comments received 09/26/13 Further revised draft submitted to EPA 10/10/13 Further revised draft submitted to EPA 12/16/13 EPA provided final approval of the BERA with the exception of Attachment 1 Part B Communication Log on 12/20/13 | 4/15/2013 |

| Deliverable ¹ | Submittal Deadline ² | Status/Comments | EPA Comments Target Date |
|---|---------------------------------|---|--------------------------|
| STORMWATER | | | |
| <i>Stormwater Loading Check-in Materials</i> | 2/1/2009 | Submitted 2/18/2009; EPA comments received 5/6/2009 | |
| <i>Revised Stormwater Loading Calculation Methods</i> | April 2010 | Submitted 04/30/2010; EPA comments received 08/17/2010 | 6/30/2010 |
| <i>Final Stormwater Loading Calculation Methods</i> | | Submitted 01/31/2011; EPA comments received 03/02/2011 Revised Report Submitted 04/15/2011 | 3/31/2011 |
| SEDIMENT | | | |
| <i>Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing</i> | | Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP. | |
| <i>Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach</i> | | Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP. | |
| <i>Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum</i> | | Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP. | |
| <i>Draft Round 3B Erosion Core Sediment FSP Technical Memorandum</i> | August 2007 | Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP. | |
| <i>Round 3B QAPP Addendum 10 for Sediment Sampling</i> | November 2007 | Submitted 12/17/2007. Need EPA approval of this QAPP Addendum. | |
| <i>Round 3 Sediment Trap Deployment Field Report</i> | | Submitted 06/30/2011 | |
| FATE & TRANSPORT | | | |
| <i>Draft Chemical Fate & Transport Model Development and Data Gaps Identification Report</i> | July 2007 | Submitted 7/20/2007; EPA comments received 10/15/07. LWG response to comments submitted 1/8/2008. | |

| Deliverable¹ | Submittal Deadline² | Status/Comments | EPA Comments Target Date |
|---|---------------------------------------|--|--|
| <i>F&T Surface Sediment FSP – Addendum to 3B Sediment FSP</i> | December 2007 | Submitted 12/10/2007; EPA comments received 1/2/08. 1/16/08 LWG agreed with EPA not to perform the sampling. Need EPA agreement that this deliverable is no longer needed. | |
| <i>Draft Bioaccumulation Modeling Report</i> | | Submitted 7/27/2009 | |
| CULTURAL RESOURCES | | | |
| Draft Cultural Resource Survey Report | 12/16/2005 | Submitted 12/16/2005 | 2/14/2006; EPA comments not time-critical at this point in the project |
| BIOLOGICAL ASSESSMENT | | | |
| <i>Preliminary Draft Site-Wide Biological Assessment - Electronic Version For Early EPA Team Review</i> | 3/30/2012 | Submitted 03/20/2012 | 6/29/2012 |
| <i>Preliminary Draft Site-Wide Biological Assessment - Formal Publically Accessible Submittal</i> | 3/30/2012 | Submitted 03/30/2012 | 6/29/2012 |

Notes:

- ¹ - **Bolded Deliverables** are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a).
Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC.
Italicized Deliverables do not have stipulated penalty amounts.

- ² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Only deliverables due within the next four months are shown.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.